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Attorney for Plaintiff  
MARICELA RAMIREZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MARICELA RAMIREZ,

Plaintiff,

vs.

UNITED AIRLINES, INC., a foreign  
corporation; COMPANIA MEXICANA  
DE AVIACION, S.A. DE C.V., a  
Mexican corporation doing business as  
MEXICANA AIRLINES (an assumed  
business name), and JOHN DOES 1  
THROUGH 10,

Case No. C 05 4065 WHA

JOINT STIPULATION  
REGARDING ALL  
OUTSTANDING DISCOVERY  
MATTERS; ~~PROPOSED~~ ORDER

Defendants. }

IT IS HEREBY STIPULATED AND AGREED by and among the parties to the above-entitled action, by their respective counsel, that:

1. The parties have met and conferred regarding all outstanding discovery matters.

2. The parties are in mutual agreement that all outstanding issues regarding plaintiff's requests for production of documents are resolved.

3. The parties are in mutual agreement that all outstanding issues regarding plaintiff's interrogatories will be resolved in the following manner:

a. Mexicana will provide the following information to the extent that such information is in its possession;

i. Whether Mexicana Flight No. 905 on October 9, 2005, was equipped with a weather radar system and, if so, whether that system was in operation during the subject flight.

ii. Whether the pilot of Mexicana Flight No. 905 received any updates regarding weather, including ATIS, while enroute from Los Angeles to Mexico City.

iii. Whether the "Fasten Seatbelt" sign was illuminated 30 minutes prior to the arrival of Mexicana Flight 905.

iv. Whether the cabin crew received any in-flight warnings of turbulence during the last 30 minutes of Mexicana Flight 905.

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4. The parties are in mutual agreement that all outstanding issues regarding plaintiff's notice of depositions will be resolved in the following manner:

a. Mexicana will produce the following individuals for deposition in Los Angeles, California, at a mutually agreed upon date and time:

- i. Captain Raul Jorge Molina Paul
- ii. First Officer Armando Galaz Martinez
- iii. When available, the purser onboard Flight No. 905 on October 9, 2005.

This joint stipulation represents the full and complete resolution of all outstanding discovery issues between the parties, including all outstanding issues regarding plaintiff's interrogatories, document requests, and notice of depositions.

Dated: May 12, 2006

CONDON & FORSYTH LLP

By: 

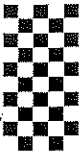
FRANK A. SILANE  
JENNIFER J. JOHNSTON  
JAMES C. FINNEY  
Attorneys for Defendant  
MEXICANA AIRLINES

Dated: May 12, 2006

THOMAS J. FLAHERTY ATTORNEY  
AT LAW

By: 

THOMAS J. FLAHERTY  
Pro Hac Vice Attorney for Plaintiff  
MARICELA RAMIREZ



1 Dated: May 2, 2006

STERNS & WALKER

By: 

BRENDA D. POSADA  
Attorney for Plaintiff  
MARICELA RAMIREZ

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~~[PROPOSED]~~ ORDER

On the filing of the joint stipulation of the parties hereto by their respective attorneys, dated May 12, 2006, regarding all outstanding discovery matters,

IT IS ORDERED that the joint stipulation represents the full and complete resolution of all outstanding discovery issues between the parties, including all outstanding issues regarding plaintiff's interrogatories, document requests, and notice of depositions.

DATED: May 15, 2006



HONORABLE WILLIAM ALSUP  
United States District Court  
Northern District of California

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